

UNITED STATES DISTRICT COURT

for the
Southern District of Illinois

John D. Haywood B44617)
 _____) Case Number: 20-1239-SMY
 _____) (Clerk's Office will provide)
 _____)
 Plaintiff(s)/Petitioner(s))
 v.) ☐ CIVIL RIGHTS COMPLAINT
 _____) pursuant to 42 U.S.C. §1983 (State Prisoner)
Boy Scouts of America) ☐ CIVIL RIGHTS COMPLAINT
Troop leader Hiram Roberts) pursuant to 28 U.S.C. §1331 (Federal Prisoner)
 _____) ☒ CIVIL COMPLAINT
 _____) pursuant to the Federal Tort Claims Act, 28 U.S.C.
 Defendant(s)/Respondent(s)) §§1346, 2671-2680, or other law

I. JURISDICTION

Plaintiff:

- A. Plaintiff's mailing address, register number, and present place of confinement.

Lawrence Correction Center
 John D. Haywood B44617
 10930 Lawrence Rd.
 Sumner, La. 70466.

Defendant #1:

- B. Defendant
- Boy Scouts of America
- is employed as

(a) (Name of First Defendant)

Controls Scouting Troops Across America

(b) (Position/Title)

with Boy Scouts of America

(c) (Employer's Name and Address)

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government? ☐ Yes ☒ NoNot that I know of!

If your answer is YES, briefly explain:

Defendant #2:

C. Defendant Hiram Roberts Sr is employed as

(Name of Second Defendant)

Troop leader Cub Scouts

(Position/Title)

with Boy Scouts of America

(Employer's Name and Address)

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☒ Yes ☐ No

Muskegon Michigan Port District

If you answer is YES, briefly explain:

He was over Shelders Port Services - Baseball

Little league, Peewee league, Pony league in the 70's

Additional Defendant(s) (if any):

D. Using the outline set forth above, identify any additional Defendant(s).

II. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in state or federal court while you were in prison or jail (during either your current or a previous time in prison or jail), e.g., civil actions brought under 42 U.S.C. § 1983 (state prisoner), 28 U.S.C. § 1331 (federal prisoner), 28 U.S.C. §§ 1346, 2671-2680, or other law? ☒ Yes ☐ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. List ALL lawsuits in any jurisdiction and indicate the court where they were filed to the best of your ability, including those that resulted in the assessment of a "strike" under 28 U.S.C. § 1915(g) and/or those that were dismissed for being frivolous, malicious, or for failure to state a claim (see 28 U.S.C. § 1915A; 28 U.S.C. § 1915(e)(2); Federal Rule of Civil Procedure 12(b)(6)). FAILURE TO FULLY DISCLOSE YOUR LITIGATION HISTORY, INCLUDING "STRIKES," MAY RESULT IN SANCTIONS THAT INCLUDE DISMISSAL OF THIS ACTION.

1. Parties to previous lawsuits:

Plaintiff(s): *John D. Heywood*

Defendant(s):

Dr. Finnerman

2. Court (if federal court, name of the district; if state court, name of the county): *Southern District of Illinois*

3. Docket number:

4. Name of Judge to whom case was assigned:

5. Type of case (for example: Was it a habeas corpus or civil rights action?): *1983 Civil Rights*

6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?): *Pending*

7. Approximate date of filing lawsuit: *1-2018*
8. Approximate date of disposition: *Pending*
9. Was the case dismissed as being frivolous, malicious, or for failure to state a claim upon which relief may be granted and/or did the court tell you that you received a "strike?" *Pending*

III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? ☒ Yes ☐ No
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure? ☐ Yes ☒ No
- C. If your answer is YES,
1. What steps did you take?
2. What was the result?
- D. If your answer is NO, explain why not.
Happened 1973-74 as child
- E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? ☐ Yes ☒ No
- F. If your answer is YES,
1. What steps did you take?

2. What was the result?

G. If your answer is NO, explain why not.

childhood assault

H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:

IV. STATEMENT OF CLAIM

- A. State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments or citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits. You should also attach any relevant, supporting documentation.

Lived in Muskegon Michigan went to Oakview Elementary Spent Summer at Shields Park Mr. Roberts ran the food program and Baseball I went to school with his youngest daughter (Carla Roberts) we played little league together, She told me her father (Mr. Roberts) was also a Cub Scout leader, and I should ask my father (Joseph E. Hayward Sr) to join. I did my father spoke to Mr. Roberts, and paid for my uniform, which would take a while. I went to several meetings at the Shields Park mostly But once we all stayed at Mr. Roberts Home for the weekend. His daughter Carla, slept in his room, while the boys slept on floor in living room (1 Bedroom) I went to go pee, went to the bathroom and Mr. Roberts came in and said let me help you, I said I could do it and he said your not going to pee all over my toilet, he stood behind me and took hold of my penis while I peed, when I was done he held on and started moving it back and forth until I ejaculated into the toilet washed his hand, told me to flush and wash my hands, I did. Next morning boys were laughing at me cause I had stains on front of my underwear they thought I peed on myself, I got dressed Told Mr. Roberts I had to go home, and he took every body home, his daughter lived 2 hours drive from me (he lived 1214 Francis Ave) we pulled into her drive, he told her to go in, and told me See you next week I'd hate for your father to loose his money, he would be pretty upset, would he, I nodded and got out and ran home!

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

Monetary Compensation \$10,000,000

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 11- - 20
(date)

John D. Heywood
Signature of Plaintiff

10930 Lawrence Rd.
Street Address

John D. Heywood
Printed Name

Sumner IA 52466
City, State, Zip

B44617
Prisoner Register Number

Signature of Attorney (if any)

Additions To Case History : & Appointments of Counsel :

1. Heywood v Tubbs - Attorney Appointed
Southern District of Illinois
1983 Civil Rights
Pending
Summary 2018
Pending
No
2. Heywood v Plouffe
Southern District of Illinois
1983 Civil Rights
Dismissed - failure to exhaust
Appeals going
Summary 2018
No
3. Heywood v Baylor - Attorney was Appointed
Southern District of Illinois
1983 Civil Rights
Dismissed, Appeal lost Aug 2020
Filed 1-2018
No.

4. Heywood v. Shuck et al - Attorney Represented

Southern District of Illinois

1983 Civil Suit

Pending

1-2018

Pending

NO

5. Heywood v. Jeffries

Southern District of Illinois

1983 Civil Suit

Pending

7-2020

Pending

NO.

Right now I am unable to give you the case no. or attorney
name and addresses as I'm is the intermediary not feeling
so well hopefully temporary, this is all I can provide
Now Sorry!

Jeffrey D. Heywood 3441619
ed.
16930 Lewisville

Sumner, IL 62446.

Date: 11/9/2020

**Lawrence Correctional Center
Trust Fund**

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Time: 9:01am

d_list_inmate_trans_statement_composite

Inmate Transaction Statement

REPORT CRITERIA - Date: 05/09/2020 thru End: Inmate: B44617; Active Status Only ? : No; Print Restrictions ? : Yes;
 Transaction Type: All Transaction Types; Print Furloughs / Restitutions ? : Yes; Include Inmate Totals ? : Yes; Print Balance
 Errors Only ? : No

Inmate: B44617 Haywood, John D.**Housing Unit: LAW-H -01-01**

Date	Source	Transaction Type	Batch	Reference #	Description	Amount	Balance
Beginning Balance:						0.40	
05/15/20	Payroll	20 Payroll Adjustment	1361112		P/R month of 4 2020	10.00	10.40
05/26/20	Disbursements	81 Legal Postage	147334	Chk #79199	046189, Pitney Bowes, Inv. Date: 04/27/2020	-.30	10.10
05/26/20	Disbursements	81 Legal Postage	147334	Chk #79199	046417, Pitney Bowes, Inv. Date: 05/04/2020	-2.20	7.90
05/26/20	Disbursements	84 Library	147334	Chk #79200	046228, DOC: 523 Fun, Inv. Date: 04/28/2020	-2.20	5.70
05/26/20	Disbursements	84 Library	147334	Chk #79200	046696, DOC: 523 Fun, Inv. Date: 05/14/2020	-.40	5.30
06/08/20	Point of Sale	60 Commissary	160713	660079	Commissary	-5.09	.21
06/11/20	Payroll	20 Payroll Adjustment	1631112		P/R month of 5 2020	9.91	10.12
06/22/20	Disbursements	80 Postage	174334	Chk #79680	047003, Pitney Bowes, Inv. Date: 05/29/2020	-.12	10.00
07/02/20	Point of Sale	60 Commissary	1847146	662097	Commissary	-8.88	1.12
07/10/20	Payroll	20 Payroll Adjustment	1921112		P/R month of 6 2020	9.88	11.00
07/21/20	Disbursements	81 Legal Postage	203334	Chk #80125	047557, Pitney Bowes, Inv. Date: 06/29/2020	-.50	10.50
07/21/20	Disbursements	81 Legal Postage	203334	Chk #80125	047624, Pitney Bowes, Inv. Date: 07/01/2020	-.50	10.00
07/21/20	Disbursements	81 Legal Postage	203334	Chk #80125	047844, Pitney Bowes, Inv. Date: 07/13/2020	-.50	9.50
07/21/20	Disbursements	81 Legal Postage	203334	Chk #80125	047929, Pitney Bowes, Inv. Date: 07/15/2020	-.50	9.00
07/21/20	Disbursements	84 Library	203334	Chk #80126	047998, DOC: 523 Fun, Inv. Date: 07/17/2020	-.60	8.40
07/29/20	Point of Sale	60 Commissary	211731	664054	Commissary	-2.50	5.90
08/14/20	Payroll	20 Payroll Adjustment	2271112		P/R month of 7 2020	10.00	15.90
08/21/20	Disbursements	81 Legal Postage	234334	Chk #80757	048056, Pitney Bowes, Inv. Date: 07/21/2020	-1.60	14.30
08/21/20	Disbursements	81 Legal Postage	234334	Chk #80757	048407, Pitney Bowes, Inv. Date: 08/03/2020	-.50	13.80
08/21/20	Disbursements	81 Legal Postage	234334	Chk #80757	048507, Pitney Bowes, Inv. Date: 08/07/2020	-.50	13.30
08/21/20	Disbursements	81 Legal Postage	234334	Chk #80757	048520, Pitney Bowes, Inv. Date: 08/12/2020	-.50	12.80
08/21/20	Disbursements	81 Legal Postage	234334	Chk #80757	048688, Pitney Bowes, Inv. Date: 08/14/2020	-.50	12.30
08/21/20	Disbursements	84 Library	234334	Chk #80758	048089, DOC: 523 Fun, Inv. Date: 07/24/2020	-1.80	10.50
08/21/20	Disbursements	84 Library	234334	Chk #80758	048094, DOC: 523 Fun, Inv. Date: 07/24/2020	-2.20	8.30
08/21/20	Disbursements	84 Library	234334	Chk #80758	048509, DOC: 523 Fun, Inv. Date: 08/07/2020	-.80	7.50
08/21/20	Point of Sale	60 Commissary	2347146	665974	Commissary	-7.40	.10
09/14/20	Payroll	20 Payroll Adjustment	2581112		P/R month of 8 2020	10.00	10.10
09/21/20	Point of Sale	60 Commissary	2657146	668208	Commissary	-8.54	1.56
09/23/20	Disbursements	84 Library	267334	Chk #81464	048880, DOC: 523 Fun, Inv. Date: 08/26/2020	-.60	.96
09/23/20	Disbursements	84 Library	267334	Chk #81464	049567, DOC: 523 Fun, Inv. Date: 09/21/2020	-.40	.56
10/14/20	Payroll	20 Payroll Adjustment	2881112		P/R month of 9 2020	9.86	10.42
10/23/20	Point of Sale	60 Commissary	297714	670215	Commissary	-6.40	4.02
10/26/20	Disbursements	84 Library	300334	Chk #82096	049866, DOC: 523 Fun, Inv. Date: 10/01/2020	-.40	3.62

Date: 11/9/2020

Time: 9:01am

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Lawrence Correctional Center**Trust Fund**

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Inmate Transaction Statement

REPORT CRITERIA - Date: 05/09/2020 thru End; Inmate: B44617; Active Status Only ? : No; Print Restrictions ? : Yes;
 Transaction Type: All Transaction Types; Print Furloughs / Restitutions ? : Yes; Include Inmate Totals ? : Yes; Print Balance
 Errors Only ? : No

Inmate: B44617 Haywood, John D.**Housing Unit: LAW-H -01-01**

Date	Source	Transaction Type	Batch	Reference #	Description	Amount	Balance
10/26/20	Disbursements	81 Legal Postage	300334	Chk #82098	049729, Pitney Bowes, Inv. Date: 09/25/2020	-.80	2.82
10/26/20	Disbursements	81 Legal Postage	300334	Chk #82098	049868, Pitney Bowes, Inv. Date: 10/01/2020	-2.10	.72
10/26/20	Disbursements	80 Postage	300334	Chk #82098	050270, Pitney Bowes, Inv. Date: 10/20/2020	-.50	.22

Total Inmate Funds: .22

Less Funds Held For Orders: .00

Less Funds Restricted: .00

Funds Available: .22

Total Furloughs: .00

Total Voluntary Restitutions: .00

Date

T

HCU-01-01

CERTIFICATION

(TO BE COMPLETED BY AN AUTHORIZED INSTITUTIONAL OFFICER)

Plaintiff/Petitioner: Haywood, John D.

Institution: Lawrence Correctional Center

Register Number: B44617

I, Stacey Wilson, Trust Fund Officer, hereby certify that the
(Name and Title of Authorized Officer - please print)

inmate identified above currently has the sum of \$.22 on account at

Lawrence correctional center
(Institution where confined)

Stacey Wilson
Signature of Authorized Officer

Dated: 11/9/2020

PURSUANT TO 28 U.S.C. § 1915(a)(2), PLEASE
ATTACH A COPY OF THE INMATE'S TRUST
FUND ACCOUNT STATEMENT
FOR THE PAST SIX MONTHS.

Please mail the statement and this completed form to:

Clerk of Court
United States District Court
Southern District of Illinois
750 Missouri Ave.
East St. Louis, IL 62201